

K.W.P., by his parent and next friend
TOMESHA PRIMM,

Plaintiff,

vs.

KANSAS CITY PUBLIC SCHOOLS, et al.

Defendants.

MOTION TO EXTEND DEADLINE TO FILE MOTIONS TO STRIKE EXPERT DESIGNATIONS OR PRECLUDE EXPERT TESTIMONY (DAUBERT MOTIONS)

Plaintiff K.W.P., by his parent and next friend Tomesha Primm, moves this court to extend the deadline for Plaintiff to file motions to strike expert designations or preclude expert testimony (*Daubert* motions) from August 31, 2017, to September 29, 2017. In support, Plaintiff states:

1. Under the current scheduling order, all motions to strike expert designations or preclude expert testimony premised on *Daubert v. Merrill Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993), shall be filed on or before August 31, 2017. ECF No. 11.
2. On July 19, 2017, Defendant KCPS filed an Unopposed Motion to Conduct a Rule 35 Mental Examination and to Extend Pretrial Deadlines. ECF No. 60.
3. In its order granting Defendant KCPS's unopposed motion, this Court granted Defendant KCPS's request to extend its deadline to disclose expert witnesses to August 11, 2017, and Plaintiff's request to extend its deadline to depose Defendant KCPS's expert witnesses to September 15, 2017. ECF No. 61.

4. Plaintiff has scheduled depositions of Defendant KCPS's two disclosed expert witnesses to take place on or before September 15, 2017, but those depositions have not yet taken place.
5. For these reasons, Plaintiff requests that Plaintiff's time for filing all motions to strike expert designations or preclude expert testimony be extended to September 29, 2019, two weeks after the extended deadline to depose Defendant KCPS's expert witnesses.
6. The requested extension will not require any other changes to the scheduling order.

WHEREFORE Plaintiff and Defendants request this Court extend the time for Plaintiff to file all motions to strike expert designations or preclude expert testimony through September 29, 2017.

Respectfully submitted,

/s/Gillian R. Wilcox

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2017, I filed the foregoing with the Clerk of the Court using the CM/ECF system, and a copy was made available to all electronic filing participants.

/s/ Gillian R. Wilcox